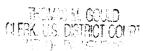
## RECEIVED

## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION

2014 APR -7 AM 10: 28



Cusio Cossett Winfield				
Susie Gassett-Winfield				
(Name of plaintiff or plaintiff	s)			
v.	CIVIL ACTION N	0		
Shelby County School	ols			
(Formerly Known As)	)			
Memphis City School	ls			
(Name of defendant or defendant	dants)			
	ght pursuant to Title VII of the Civil Jurisdiction is specifically conferred			
42 U.S.C. §2000e-5. Equitable	le and other relief are also sought un	der 42 U.S.C. §2000e-5(g).		
2. Plaintiff,	Susie Gassett-Winfield			
-	(name of plaintiff)			
is a citizen of the United State	es and resides at 8815 Dewberry	Lane		
	(street ad	dress)		
Cordova	USA	Tennessee		
(city)	(country)	(state)		
38016	(90	(901) 552-5058		
(zip code)	(te	(telephone number)		

3. Defendant		School (formerly kn	own as) Mer	nphis City Schools
lives at, or its busines	`	lefendant's name)  O South Hollywood S  (street address)	street Memph	nis, TN 38112
4. Plaintiff so 2597 Aver	•	m the defendant or was	s employed by	the defendant at
Memphis	USA	(street address) Tennes	see	38112
(city)	(country)	(state)		(zip code)
	bout 10	plaintiff in the manner August	2012	paragraph 9 of
	(day)	(month)	(year)	
	g defendant with the a	the defendant with the cts of discrimination ir		
•	(day)	(month)	(year)	
Commission charging	g defendant with the a	e defendant with the E cts of discrimination ir September	idicated in par	ragraph 9 of this
	(day)	(month)	(year)	
	y plaintiff on24	unity Commission issu  January 2014  y) (month) (year)		
9. Because o	f plaintiff's (1)	race, (2) color, (3)	_x sex, (4) _	religion,
(5) national origin	ı, defendant			
(a) f	ailed to employ plain	tiff.		
(b) <u>x</u> t	erminated plaintiff's	employment.		
(c) f	ailed to promote plain	ntiff.		
(d) <u>x</u> ı (2) Refusal to give supe	retaliation/due to (1) ervisor money (\$30,000	Plaintiff refusal to po ). (3) Plaintiff refusal to a	urchase supe	ervisor gifts. oriate verbal comments.
(e) _x_ c	ontinued retaliation (1)	Former Supervisor has c	ontinued to sla	nder the Plaintiff after
	• •	ployment. (2) The Defer		
negative behavior from	m the Former Superviso	or and other employees.	(3) The continu	ued retaliation/harassmer
•	reflected in the EEOC	file and additional reports	s have been file	ed with the Memphis Police
Department.				

10. The circumstances under which defendant discriminated against plaintiff were as
follows: (1) The Defendant overlooked the known disability within the Plaintiffs personnel file. The
Plaintiff has been disabled for 18 years. (2) The Plaintiff requested to be removed from under her
Supervisor due to the fact, his behavior was impacting her disability. Administrators removed the Plaintiff's
secretary from under her leadership, but they refused to remove the Plaintiff from under the leadership of her
Supervisor, even after receiving a physician's letter. (3) The Plaintiff job responsibilities were the same as
the other 3 Attendance Teachers but her pay was at least \$20,000 less. (4) The Plaintiff visited the EEOC in
February 2012 prior to her termination due to the hostile work environment. The EEOC advised the
Defendant to conduct a thorough investigation regarding the Plaintiff's complaints/concerns. The EEOC
records will reflect that the Defendant could not provide them with documentation to reflect that a investigation
of the Plaintiffs complaints/concerns was conducted. (5) During a meeting with the HR Staff, the Supervisor
ridicule the Plaintiff disability several times and the Administrators did not intervene. (6) The Plaintiff received
a death threat that was not investigated by the Defendant. (7) Defendant did not follow their own policy
at that time (Guidelines for Progressive Discipline & Grievance Procedures) which protects employees from
all forms of harassment/discrimination. They omitted the 6 steps to follow prior to terminating a employee.

(a) x are still being committed by defendant.
(b) are no longer being committed by defendant.
(c) may still be being committed by defendant.
12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.
WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:
(a) Defendant be directed to employ plaintiff, or
(b) Defendant be directed to re-employ plaintiff, or
(c) Defendant be directed to promote plaintiff, or;
(d)x Defendant be directed to pay the Plaintiff the sum of \$750,000 which includes
back pay, doctor fees, attorney fees, medications, mental anguish, job searching pain and suffering. This amount is based upon EEOC guidelines/employer size.

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury. Yes ( ) No (x)

11. The acts set forth in paragraph 9 of this complaint